



Plaintiff Jose Olvera (hereinafter the “Named Plaintiff”) individually and on behalf of all others similarly situated has filed this action with the Court, alleging violations of the Fair Labor Standards Act 29 U.S.C. Sec. 201 *et. seq.* .

On November 1, 2013 a hearing was held on Plaintiffs Motion before the Court for conditional certification of a class of current and former employees of the Defendants’ utility services company working as Laborers. The Court instructed Plaintiffs to provide additional information regarding those individuals who have filed declarations previously. This supplement provides the Court with the requested information.

### **I. CLAIMS AND FACTUAL BACKGROUND**

Defendants Utilimap Corporation, Quanta Management Services Partnership, L.P. , and Quanta Services Company, Inc.,( hereinafter the “Defendants”) employed the Named Plaintiff as well as members of the Collective Class for some period of time within the statutory period contained within the Fair Labor Standards Act 29 U.S.C. § 201 *et. seq.* The Named Plaintiff performed non-exempt work for Defendants’ utilities services companies. During his employment with Defendants, the Named Plaintiff and members of the Collective Class routinely worked in excess of 40 hours per workweek and were paid on an hourly basis. Plaintiffs allege, *inter alia*, that, under a common plan and practice, Defendants deliberately sought to evade the clear mandate of the Fair Labor Standards Act by refusing to pay any overtime to any Laborers in the Company for the hours worked in excess of 40 hours in a given workweek. Plaintiffs further allege the Defendants, through the use of fraudulent and illegal accounting and bookkeeping practices, deliberately withheld compensation from Named Plaintiff and members of the Collective Class for work performed, but not recorded (“off-the-clock” work)

Jose Olvera, as Named Plaintiff, filed Plaintiff’s Original Complaint on April 5, 2013.

**II. SUPPLEMENTAL INFORMATION REQUESTED BY THE COURT**

Pursuant to the Court's request, Plaintiffs have obtained new and expanded Declarations from Named Plaintiff Olvera and each of the twelve current or former employees of Defendants that have filed with the Court Consents to Join this lawsuit . The Declarations are attached herein as Exhibits **A-M**

Each Declaration of the Consents includes a certified translation, attesting to its accuracy. The new Declarations recount with specificity the circumstances surrounding their employment and the pay practices they experienced with the Defendants.

Respectfully submitted,

THE LAW OFFICES OF JOE M. WILLIAMS &  
ASSOCIATES

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**ATTORNEYS FOR PLAINTIFF  
JOSE OLVERA**

**CERTIFICATE OF SERVICE**

This is to certify that on this the 15<sup>th</sup> day of November, 2013, a true and correct copy of the foregoing instrument has been forwarded to all counsel of record via the Court's ECF electronic filing system.

By: /s/ Joe M. Williams

Joe M. Williams